

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Aaron Abadi,	: Case No.: 1:23-cv-04033-LJL
	: DECLARATION OF KRISTY
Plaintiffs,	: JENELLE KANICK IN SUPPORT OF
	: GULF AIR GROUP HOLDING
-against-	: COMPANY B.S.C. (c)'S MOTION TO
	: DISMISS
American Airlines Group, Inc., <i>et al.</i> ,	:
	:
Defendant.	: -----X

I, Kristy Jenelle Kanick, hereby declare and state as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration.
2. I hold the position of Senior Legal Counsel at Gulf Air Group Holding Company B.S.C. (c) (sued herein as "Gulf Air Holding B.S.C." and hereinafter "Gulf Air Group Holding") with a business address of Building 122, Road 2403, Block 224, Muharraq, Kingdom of Bahrain, and have been employed in this position since April 1st, 2023.
3. My duties and responsibilities include the provision of in-house legal services to Gulf Air Group Holding and its subsidiary companies.
4. I submit this Declaration in support of Gulf Air Group Holding's Motion to Dismiss.
5. I am familiar with the facts and allegations contained in Plaintiff's Complaint and Supplemental Complaint and submit this Declaration based upon my personal knowledge and/or my review of the records of Gulf Air Group Holding that are created and maintained in the regular course of its business.

6. Gulf Air Group Holding is a state-owned company wholly owned by Bahrain Mumtalakat Holding Co. B.S.C. (c) which is the sovereign wealth fund of the Kingdom of Bahrain..

7. Gulf Air Group Holding is a corporation organized and existing under the laws of the Kingdom of Bahrain.

8. Gulf Air Group Holding maintains its headquarters and principal place of business in the Kingdom of Bahrain.

9. Gulf Air Group Holding has never maintained a principal place of business in any state in the United States, including New York or Texas.

10. Gulf Air Group Holding is not an air carrier, does not operate any aircraft/flights and is not involved in arranging air travel reservations with passengers.


11. Gulf Air Group Holding was founded in 2010 to consolidate the aviation assets of Mumtalakat in the Kingdom of Bahrain.

12. Gulf Air Group Holding is the sole shareholder of Gulf Air B.S.C. (c) ("Gulf Air"), Bahrain's national air carrier.

13. Gulf Air is a corporation organized and existing under the laws of the Kingdom of Bahrain engaged in the business of the carriage by air of passengers, baggage and cargo.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 16th November 2023.


KRISTY JENELLE KANICK